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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL MATTERS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE FILED
UNDER SEAL**

Judge: Hon. Lisa J. Cisneros
Courtroom: G - 15th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am a partner at Kirkland & Ellis LLP, counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I offer this Declaration in
4 the above-captioned matter in support of Uber’s Administrative Motion to Consider Whether Another
5 Party’s Materials Should Be Filed Under Seal.

6 2. Attached as **Exhibit A** is the Joint Discovery Letter re Deficient Production of Plaintiffs’
7 Expert Materials, with redactions related to Plaintiff’s confidential materials.

8 3. Attached as **Exhibit B** is Ex. 1 to Joint Discovery Letter re Deficient Production of
9 Plaintiffs’ Expert Materials (sealed in full).

10 4. Attached as **Exhibit C** is Ex. 2 to Joint Discovery Letter re Deficient Production of
11 Plaintiffs’ Expert Materials (sealed in full).

12 5. Attached as **Exhibit D** is Ex. 3 to Joint Discovery Letter re Deficient Production of
13 Plaintiffs’ Expert Materials (sealed in full).

14 6. Attached as **Exhibit E** is Ex. 4 to Joint Discovery Letter re Deficient Production of
15 Plaintiffs’ Expert Materials (sealed in full).

16 7. Attached as **Exhibit F** is Ex. 5 to Joint Discovery Letter re Deficient Production of
17 Plaintiffs’ Expert Materials (sealed in full).

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19 Dated: January 2, 2026

20 /s/ Laura Vartain Horn
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